

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

DSCF Standard Mail Load Leveling

Docket No. N2014-1

PUBLIC REPRESENTATIVE
THIRD INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS TO UNITED STATES POSTAL SERVICE WITNESS MALONE
(PR/USPS-T1-21-29)

(January 24, 2014)

Pursuant to Rules 25 through 28 of the Postal Regulatory Commission Rules of Practice, the Public Representative hereby submits the following interrogatories and requests for production of documents. Definitions and instructions included with the Public Representative's interrogatories PR/USPS-T1-1-10 dated January 3, 2014, are hereby incorporated by reference.

Respectfully Submitted,

/s/ Anne J. Siarnacki

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Docket No. N2014-1

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PR/USPS-T1-21

In Docket Nos. N2012-1 and N2010-1, the Postal Service detailed extensive estimates of projected cost savings expected from implementation of the related service changes. In response to PR/USPS-T1-9, you stated that “[t]he Postal Service has not performed any analysis that would provide a basis for estimating mail processing or delivery workload reductions or cost savings resulting from Load Leveling on a system-wide basis.”

- a. Please explain why the Postal Service has not performed an analysis estimating mail processing or delivery workload reductions and/or cost savings resulting from system-wide implementation of the Load Leveling Plan.
- b. Please explain whether it is feasible to estimate mail processing or delivery workload reductions and/or cost savings resulting from system-wide implementation of the Load Leveling Plan and describe in detail any methods or programs the Postal Service could use to produce such an estimate.

PR/USPS-T1-22

In Docket No N2012-1, the Postal Service analyzed the capacity of the mail processing network and potential future designs using a variety of analytical methods. Specifically, the Postal Service focused on two aspects of capacity and design: (1) the workload required to process volumes in the context of the current and proposed service standards and (2) the operating windows required to meet those service standards. The Postal Service showed that as service standards are reduced, operating windows can be increased. The increase in operating flexibility associated with reduced service decreased the amount of processing equipment and physical capacity required for the network to process the mail.

- a. Will the Load Leveling Plan increase or decrease the amount of processing equipment required to meet service standards? Please identify, describe, and provide all documents detailing how the Load Leveling Plan could impact the amount of processing equipment needed by the Postal Service.
- b. Will the Load Leveling Plan increase or decrease the physical capacity of the network (e.g., facility square footage)? Please identify, describe, and provide all documents detailing how the Load Leveling Plan could impact the amount of facility square footage needed by the Postal Service.

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In Docket Nos. N2006-1 and N2012-1, the Postal Service leveraged the IBM LogicNet software for network modeling.

- a. Did the Postal Service use IBM LogicNet or any other network modeling software to better understand the potential impacts of the Load Leveling Plan?
- b. Please identify, describe, and provide all analysis of the Load Leveling Plan using IBM LogicNet or any other network modeling software.
- c. Please identify, describe, and provide all network planning analysis that utilized IBM LogicNet or any other network modeling software and incorporated the Load Leveling Plan.

PR/USPS-T1-24

USPS-LR-N2014-1/6, file "1-10-14" are slides from a January 10, 2014 presentation given on the Load Leveling Plan. Slide 25 lists "Frequently Asked Questions/Concerns" including "early delivery" of mail entered on Thu/Fri/Sat and "5 Day Delivery implications."

- a. Please identify, describe, and provide any documents not previously provided that the Postal Service has generated to address mailer questions or concerns regarding the Load Leveling Plan.
- b. Please describe the impact 5 Day Delivery would have on the load levels throughout the week after the nationwide implementation of the Load Leveling Plan. In your response, please address both DSCF Standard Mail volume specifically, as well as the overall mail volume.
- c. Please identify, describe, and provide all documents detailing the impact of implementation of both 5 Day Delivery and the Load Leveling Plan.
- d. Please explain the intended meaning of "Early delivery of mail entered on Thu/Fri/Sat" on slide 25 of file "1-10-14".
- e. Under current practices, what percentage of DSCF Standard Mail entered on Thursday or Friday is delivered "early" on Saturday, rather than Monday? Please disaggregate the response by entry day.
- f. How does the Load Leveling Plan impact the potential savings of 5 Day Delivery?
- g. How does the Load Leveling Plan impact the ability of the Postal Service to realize its full estimated savings of 5 Day Delivery?

PR/USPS-T1-25

The Postal Service recently announced plans to delay Phase 2 of its Network Rationalization Initiative.

- a. Please confirm that the Postal Service plans to delay Phase 2 of its Network Rationalization Initiative. If not confirmed, please explain.
- b. Please discuss and explain in detail the interaction between the Load Leveling Plan and Mail Processing Network Rationalization (MPNR).
 - i. Please provide the savings realized as a result of Phase 1 of MPNR.
 - ii. Please provide an estimate of how implementation of the Load Leveling Plan will impact savings realized from Phase 1 of MPNR.
 - iii. Please provide the estimated savings expected to be realized through implementation of Phase 2 of MPNR.
 - iv. Please provide an estimate of how implementation of the Load Leveling Plan will impact savings expected to be realized from Phase 2 of MPNR.
- c. Did Phase 1 of MPNR impact the volume of mail delivered on Mondays? Please identify, describe, and provide all documents detailing the impact of Phase 1 of MPNR on the percentage of volume delivered on Mondays.
- d. Is Phase 2 of MPNR expected to impact the volume of mail delivered on Mondays to meet service standards? Please identify, describe, and provide all documents detailing the impact of Phase 2 of MPNR on the percentage of volume delivered on Mondays.
- e. Did Phase 1 of MPNR impact the percentage of carriers on the street after 1700? Please identify, describe, and provide all documents detailing the impact of Phase 1 of MPNR on carriers working after 1700.
- f. Will Phase 2 of MPNR impact the percentage of carriers on the street after 1700? Please identify, describe, and provide all documents detailing the impact of Phase 2 of MPNR on carriers working after 1700.

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PR/USPS-T1-26

In USPS-LR-N2014-1/NP2, the Postal Service provided disaggregated DSCF volume data. Please provide the Service Performance Data associated with the mailing information contained in this library reference. Columns 6-13 in table below is an example of the information requested.

1	2	3	4	5	6	7	8	9	10	11	12	13
					Service Performance Information							
						Volume Delivered on						
Day of Week	Facility Name	Locale Key	Piece Count	Appointment Count	Full Service Imb Volume	Day 1	Day 2	Day 3	Day 4	Day 5	Day 6+	Unable to Deliver
TUESDAY	Redacted	Redacted	Redacted	Redacted								

PR/USPS-T1-27

The Postal Service plans to implement the Load Leveling Plan no earlier than March 27, 2014.

- Please explain the Postal Service's planned implementation timetable. If no timetable is available, please explain when the Postal Service plans to establish a firm implementation timetable for the Load Leveling Plan.
- Please describe how the Postal Service plans to implement the Load Leveling Plan (e.g., nationwide on the same day or facility-by-facility). If no plans are available, please explain when the Postal Service plans to establish a Load Leveling implementation plan.
- Please explain how far in advance of implementation of the Load Leveling Plan does the Postal Service plan to provide notice to affected mailers.

PR/USPS-T1-28

In Dockets No. N2010-1 and N2012-1, the Postal Service provided estimates of the impact of proposed service changes on consumer demand.

- Does the Postal Service anticipate that there will be volume loss due to implementation of the Load Leveling Plan?
 - If yes, please identify, describe, and provide all documents detailing how the Load Leveling Plan could impact consumer demand and negatively impact volume.
 - If not, does the Postal Service believe that the volume loss will be *de minimus*? Please identify, describe, and provide all documents

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detailing how the Load Leveling Plan will not impact consumer demand.

- b. Has the Postal Service identified the customers that will be impacted by implementation of the Load Leveling Plan?
 - i. What percentage of Standard Mail DSCF Letter customers target Monday in-home dates?
 - ii. What percentage of Standard Mail DSCF Flat customers target Monday in-home dates?
 - iii. What percentage of Standard Mail DSCF Carrier Route customers target Monday in-home dates?

PR/USPS-T1-29

The Load Leveling Plan aims to reduce the peak load effects of Standard Mail. Please identify, describe, and provide any studies since FY 2012 that the Postal Service has conducted concerning peak load effects.